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October 3, 2019

**VIA ECF**

The Honorable John G. Koeltl  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007-1312

Re: United States v. Akshay Aiyer, 18-CR-00333 (JGK)

Dear Judge Koeltl:

We represent Defendant Akshay Aiyer in the above-referenced action. We write to request an amendment to the Agreed-Upon Protective Order in effect in this case (ECF No. 13).

The amendment would extend the Order's protections to documents produced by nonparty subpoena recipients. Attached to this letter are the proposed amended order and a redline documenting all changes. The Government has reviewed these attachments and has no objections to the amended order.

Respectfully submitted,

/s/ Martin Klotz  
Martin Klotz

cc: All Counsel of Record (via ECF)